

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

VALARIE WHITNER, VINCENT BLOUNT, and)
MILDRED BRYANT, individually and on behalf)
of all others similarly situated,)
)
Plaintiffs,)
v.) Civil Case No. 4:15-cv-01655-RWS
)
CITY OF PAGEDALE, a Missouri municipal)
corporation,)
)
Defendant.)

PROPOSED JOINT AMENDED CLASS CERTIFICATION SCHEDULE

In accordance with this Court's order of September 20, 2016 (ECF No. 60), the parties, by and through their counsel, jointly submit this proposed amended briefing schedule for class certification. Because of outstanding discovery issues, this proposed schedule sets out a briefing schedule that stems from the currently unknown date of the resolution of such issues to the Court's satisfaction.

1. Plaintiffs will file their Motion to Certify the Proposed Class **within eight weeks after resolution of the outstanding discovery issues.**
2. Defendant will file its Opposition to Plaintiffs' Motion **within twelve weeks after resolution of the outstanding discovery issues.**
3. Plaintiffs will file their Reply in Support of Class Certification **within fourteen weeks after resolution of the outstanding discovery issues.**

4. Plaintiffs intend to request oral argument in their Motion and the parties recommend that the Court hear argument **within eighteen weeks after the resolution of the outstanding discovery issues.**

DATED this 30th day of September, 2016.

Respectfully submitted,

INSTITUTE FOR JUSTICE

/s/William R. Maurer

William R. Maurer*, WSBA No. 25451
10500 NE 8th Street, Suite 1760
Bellevue, WA 98004
Telephone: (425) 646-9300
Fax: (425) 990-6500
E-mail: wmaurer@ij.org

Joshua A. House*, CA Bar No. 284856
901 N. Glebe Rd., Suite 900
Arlington, VA 22203
Telephone: (703) 682-9320
Fax: (703) 682-9321
E-mail: jhouse@ij.org

**Admitted Pro Hac Vice*

Attorneys for Plaintiffs

BRYAN CAVE LLP

/s/ Michael Lanahan

Michael Lanahan (MO Bar No. 67487)
J. Bennett Clark (MO Bar No. 30907)
One Metropolitan Square
211 North Broadway, Suite 3600
St. Louis, MO 63102-2750
Telephone: (314) 259-2235
Fax: (314) 259-2020
E-mail: michael.lanahan@bryancave.com

Telephone: (314) 259-2418

Fax: (314) 552-8418

E-mail: ben.clark@bryancave.com

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of September, 2016, this ***PROPOSED JOINT AMENDED CLASS CERTIFICATION SCHEDULE*** was electronically served on the below parties using the CM/ECF system of the United States District Court for the Eastern District of Missouri:

BEHR, McCARTER & POTTER, P.C.

Timothy J. Reichardt
Andrew T. Tangaro
Ryan M. Hyde
7777 Bonhomme Avenue, Suite 1400
St. Louis, MO 63105
Telephone: (314) 862-3800
Fax: (314) 862-3953
Email: treichardt@bmplaw.com
Email: atangaro@bmplaw.com
Email: rhyde@bmplaw.com

Attorneys for Defendant City of Pagedale

INSTITUTE FOR JUSTICE

/s/ William R. Maurer
William R. Maurer*, WSBA No. 25451

**Admitted Pro Hac Vice*

Attorney for Plaintiffs